

Hand-Delivered

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

FILED
CHARLOTTE, NC

AUG 4 2022

US DISTRICT COURT
WESTERN DISTRICT OF NC

STACI ANNE BRAUN, M.D.,
Plaintiff,

3:22-cv-357-RJC

v.

DAVID FREDERICK BRAUN, SERVE:
Defendant,

And

REEVES LAW FIRM, PLLC, SERVE:
Defendant,

VERIFIED COMPLAINT
CIVIL RIGHTS (Emergency relief)
INJUNCTIVE RELIEF
SLANDER/LIBEL

And

STATE OF NORTH CAROLINA, SERVE:
Defendant,

- I. Comes Now, Staci Anne Braun, M.D., (“Braun”), *Pro se*, who files this Complaint, seeking an immediate permanent and temporary injunctions as well as judgments for money in a trial by Jury, seeking redress in this Court for *civil rights violations, slander, libel, inter alia*, which are causing have damaged her¹ and an(11) eleven-year-old daughter (“CB”) to be abused (mentally, physically, and sexually) by **Defendant David Frederick Braun** through acts of corruption later described herein in an effort to silence and control the Plaintiff from reporting or speaking of criminal acts he is engaged in. **Braun** thereby states her Complaint and demands under the law as follows.

¹ The undersigned asserts herself in “third person” to make reading and comprehension of [t]his Complaint clearer.

II. PARTIES/JURISDICTION

Plaintiff Staci Anne Braun, M.D.

Staci Anne Braun, M.D., (“**Braun**”)² is a 51-year-old licensed medical doctor/practitioner who practices Emergency/Urgent Care and Family Medicine in North Carolina. **Braun** is the biological Mother of an 11-year-old daughter, “**CB**”.

Braun is located at:
127 North Tryon Street
Charlotte, North Carolina 28202
(336) 970-9709
abyssink@protonmail.com

The Plaintiff is within the jurisdiction of this Court.

Defendant David Frederick Braun

Defendant David Frederick Braun (“**DFB**”) an 80-year-old male and resident of Florida who is involved in multiple legitimate/illicit and criminal business activities around the United States, especially in North Carolina and was the significant other of the **Plaintiff** from in or about 2008 until May 2018. **DFB** is the biological father of 11-year-old **CB**.

DFB is located at to Serve:
7583 Olde Thyme Court #3C
Parkland, FL33076

DFB is within the jurisdiction of this Court

Defendant Reeves Law Firm, PLLC

Defendant Reeves Law Firm, PLLC (“**Reeves**”) was the law firm who represented the Plaintiff (**Braun**) in multiple matters around the United States and is currently representing Defendant **DFB** in a custody matter in Ashe County North Carolina against the **Plaintiff**. **Reeves** primary business is in the Western District of North Carolina.

² The Plaintiff *Staci Anne Braun, M.D.*, and Defendant *David Frederick Braun* were never married.

Reeves is located at to Serve:

Reeves, DiVenere Wright
202 East Main Street
West Jefferson, NC 28694

Mailing

P.O. Box 67
West Jefferson, NC 28694

Reeves is within the jurisdiction of this Court

Defendant State of North Carolina

Defendant State of North Carolina ("State") is the otherwise governing body in charge of Department of Social Services (Ashe County) who are complicit institutions and organizations who are engaged in systematic violations of the *civil rights* of the **Plaintiff** and is therefore a necessary party to this action.

Governor Roy Cooper is located at to Serve:

North Carolina Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Attorney General Josh Stein, to Serve:

9001 Mail Service Center
Raleigh, NC 27699-9001

State of North Carolina is within the jurisdiction of this Court

III. CASE OVERVIEW

1. The facts above are reasserted and realleged as if fully rewritten herein.
2. The **Plaintiff** is a 51-year-old practicing medical doctor who was forced to leave Ashe County North Carolina with my daughter ("**CB**") in August of 2021 due to substantial corruption and danger to myself and that of my 11-year-old daughter.

[T]he corruption, as it pertains to the instant matter, is being concocted and controlled by Defendant **DFB**, enabled by **Reeves** and allowed by **State**.

3. **DFB** began romantically pursuing **Braun** in or about 2008 and ultimately convinced **Braun** to cohabitate with him. As time passed, **DFB** pressured **Braun** into taking his name but did not marry **Braun**.
4. **DFB** falsely alleged to **Braun** that he was divorced and separated from his wife.
5. **Braun** was ultimately sued by **DFB's** former spouse (Gail Braun) for wrongful acts (*criminal conversation and alienation of affection*) which ultimately were dismissed. **Braun** was represented by Defendant **Reeves, et al**, in that action, *inter alia*.
6. In or about 2011 **Braun** became pregnant with a child resulting from the relationship with **DFB**.
7. In or about 2011 **DFB** highly pressured **Braun** to stop clinical practice as a doctor and to handle business and administrative affairs for him as well as caring for **DFB's** medical needs. For a period of time, **Braun** agreed. Following the agreement to handle business and administrative activities, **Braun** and **DFB** bought properties, land and engaged in multiple business activities together, while Defendant **Reeves** represented both parties, collectively and separately as their Counsel in these and other matters.
8. In or about 2012 **Braun** began to notice improper business activates by **DFB**, as well as noticing substantial financial irregularities being sent to an accountant by **DFB**. In addition, **Braun** began to question the business tactics of **DFB** and began to ask **DFB** questions.

9. When **Braun** began to question **DFB's** activities, **Defendant Reeves** (a law firm) gave **Braun** multiple assurances that **DFB** was completely legitimate and above board.
10. In or about 2013 **DFB** began to intimidate **Braun** and her family.
11. In or about 2015 **Braun** refused to continue her involvement in **DFB's** businesses, with **DFB** ultimately transferring accounting and other financial responsibilities to a third party.
12. In or about summer of 2017, **DFB** began to concoct a scheme to have the undersigned diagnosed as "*bipolar*" and to convince the public Braun us crazy. **DFB** began informing the public that the undersigned is *bipolar, inter alia*. **DFB** began going to multiple counselors informing them that **Braun** is *bipolar*. **DFB** began informing the counselors and the public that **Braun** was suicidal, claiming that **Braun** was heading to New York to a seedy part of town to commit suicide by rape and murder.
13. In or about 2017 **Braun** was coerced and manipulated by **DFB** and **Reeves** to relinquish all of her interests in jointly owned assets, for no compensation or pecuniary benefit, despite having invested a large amount of cash and kind in all properties and assets jointly owned. The coercion of **Braun** involved innuendos and situations that caused fear of harm to **Braun** and her children as well as other family members. It is noteworthy that during the course of these dark years, **DFB** engaged in non-consensual rape of **Braun**, including causing transmitting herpes to **Braun** without ever notifying **Braun** that **DFB** had sexually transmitted diseases.

14. In or about April 2018 **Braun** was able to finally conclude that **DFB** had been engaging in substantial criminal conduct, including major tax evasion, financial frauds, and possible Medicare frauds. **Braun** could no longer take the continual and increasing torment and concerns of being harmed by **DFB** in actual fear for her children's and her lives. **Braun** left.
15. **DFB** tracked **Braun** down and committed assault against **Braun**.
16. Defendant **Reeves** contacted **Braun** and sought to "*mediate*" a *get back together* solution because **Reeves** had a long-standing relationship with **Braun** and **DFB**.
17. During the 2018-time frame, **DFB** began drive-by(s) of **Braun's** children at school, contacting **Braun's** church and telling the community that **Braun** is *bipolar* and seeking self-harm.
18. In one instance **DFB** began telling the public (at church) that **Braun** has severe depression and cannot get out of bed, when in fact **Braun** was at the hospital, practicing medicine.
19. Defendant **DFB**, utilizing Defendant **Reeves** filed a false lawsuit against **Braun**, following the assault and lawsuit by **DFB** on **Braun**.
20. In or about 2018, **DFB** began having Court ordered visitation with the minor child ("**CB**".) During the visits it was learned that **CB** was being taken on romantic dinners by **DFB**, taken in **DFB's** bed to watch sexually explicit movies and ultimately, it has been learned that **CB** has been improperly and continuously touched in a sexual manner by **DFB**.
21. Again, in or about February 2019, **DFB** and **Reeves** coerced **Braun** into settling the false lawsuit with **Braun** paying **DFB** money to **DFB** for property she had an

interest in just to get away from **DFB**, with a guarantee from **Reeves** that all attacks would cease.

22. Following the assault by **DFB**, **DFB** illegally entered the house of **Braun** in violation of pending domestic violence orders and was charged.

23. The state Court refused to enforce the DVO orders and dismissed them.

24. Throughout 2019, multiple counselors, psychologists and doctors reported that **CB** was being abused by **DFB**.

25. In each case the professional would be threatened, fired or harassed by **DFB** when they made independent conclusions that **CB** was being severely abused by **DFB**.

26. As pled *infra*, **DFB** hired his "fixer" (**Reeves**) to conceal the crimes of **DFB**, including the abuse of 11-year-old **CB**.

27. **Braun** was confronted by **DFB** where he made it clear if the **Plaintiff** left the county, assisted by **Reeves**, **DFB** would destroy **Braun**, take **Braun's** child, and ruin **Braun** in the community.

28. In or about august of 2021 **Braun** left Ashe County North Carolina with **CB** and moved to Charlotte North Carolina to protect her child and herself from **DFB** and his associates.

29. In or about august of 2021 **DFB** began to threaten **Braun** that if she did not move back to Ashe County, **DFB** will take **CB** away from **Braun**.

30. **DFB** informed **Braun** that he had several witnesses prepared to testify that **Braun** was crazy, that **Braun** was *bipolar* and harmful to **CB**.

31. In September of 2021, **DFB** produced a false report to the Ashe County Court from a pediatrician making a conclusion that **Braun** had *Munchausen by proxy*

syndrome. **DFB**, used this and the plethora of unscrupulous individuals and professionals to promulgate a *prima fascia* fraud on the Court in Ashe County to take **CB** and place her in the control of a child predator ("**DFB**".) To be clear, the bought and paid for, fraudulent report of the Child Pediatrician came from a professional who never saw or spoke with **Braun** and when confronted by an investigator, refused to sign the report. On its face, this is yet another act of corruption and the Ashe County Courts accepted this false report as fact. The corrupt court had notes in the judges file claiming **Braun** is assumed *bipolar* and ultimately allowing this child abuser (**DFB**) to have contact with the helpless child (**CB**.)

32. The child (**CB**) contracted herpes from **DFB** and has been complaining of long-standing vaginal discharge in addition to the other disgusting acts being engaged upon by **DFB** on **CB**.
33. In the duration of these abuses of **Braun** and **CB**, **DFB** has taken **CB** across several state lines and **DFB** is now trying to warehouse her in a military camp in a form of child trafficking to prevent **CB** from revealing the abuse.
34. The state of North Carolina was contacted by SEVERAL mandatory reporters that **CB** was being abused by **DFB**.
35. Some of the reports were made in writing. Many were calls. Hours and hours of calls were made by investigators and others who are mandatory reporters of abuse.
36. Each venue, including from other states always end up back in Ashe County in a demand by Ashe County that the matter belongs in Ashe, essentially stifling any valid investigation of the extreme abuse.

37. Ashe County is a hub for the corruption in this and other matters and complete lack of redress under the Constitution.
38. After multiple mandatory reporters found that **CB** was being abused, **Braun** discovered that her own lawyer was involved in allowing all of the corruption to happen to protect **DFB**.
39. Further, **Braun** discovered that **Reeves**, in addition to her own counsel, and the presiding Judge were engaging in concealing professional findings and reports of significant abuse of **CB**.
40. In one instance, **Braun's** terminated Counsel tendered a proposed Order for the Court to sign (after he was terminated) that specifically keeps the report from being seen by **Braun** and allows the report to be destroyed. This controlling report substantiates that **CB** is being abused by **DFB**.
41. In recent days **Braun** was able to obtain the Ashe County Judge's notes where the Judge engaged in subterfuge with **DFB** and his Counsel (**Reeves**.)
42. The judge's notes specifically state that **Braun** "*alleged bipolar.*"
43. The Ashe Court record did not previously contain any reference to the ridiculous allegation of *bipolar* or any mental illness of **Braun**.
44. **BRAUN'S BIPOLAR:** Because the Defendants engaged in a pattern of conduct to make **Braun** appear crazy to the community to cover up the crimes and misconduct of **DFB**, claiming that **Braun** has *Munchausen By proxy*, and or *Bipolar*, **Braun** sought out (6) six psychologists, counselors and psychiatrists, **ALL WHO FOUND THE ALLEGATIONS TO BE BASELESS.**

45. In reviewing the parties involved, the lower state Court Judge William F. Brooks, was recently (April 16th, 2022 during the **Braun** matter in state Court) suspended for misconduct as a judge which is consistent with the misconduct here.
46. As **Braun** and a group of experts have reported, over and over the abuse of **CB** and the acts committed against **Braun**, all matters end up back in Ashe County where they disappear.
47. In reviewing the Court file in [*Braun v. Braun* Case No. 18- CvD- 139, Ashe County] an order was found that was entered in May of 2022 that was never before seen. The Order specifically prevents **Braun** from seeing the report of State Agency *Department of Social Services* (“DSS”) where DSS verbally advised **Braun** that it was established that **DFB** was in fact abusing **CB**.
48. The corruption of **DFB**, the involvement of **Reeves**, the refusal by **DSS** to properly investigate and protect **CB** and myself continues to cause serious harm to **CB** and myself.

COUNT 1

49. Defendants **DFB**, **Reeves** did in fact combine, conspire and confederate, sometimes acting jointly and at others individually to deprive **Braun** of her *Constitutionally Protected Civil Rights* to have redress in the Courts and extinguish **Braun’s Due Process Rights** guaranteed under the *Constitution of the United States and North Carolina* when they used money and influence to hire and utilize professionals to produce false and fraudulent reports alleging Braun had Munchausen by Proxy syndrome.

COUNT 2

50. Defendants **DFB, Reeves** did in fact combine, conspire and confederate, sometimes acting jointly and at others individually to deprive **Braun** of her *Constitutionally Protected Civil Rights* to have *redress* in the Courts when they used fraudulent documents, money and influence to obtain illegal orders to deprive **Braun** of lawful access to her biological child and to use the kangaroo legal proceedings to silence, control, and trap **Braun** by using the threat of taking **Braun's** minor child through falsely obtained Court Orders.

COUNT 3

51. Defendants **DFB, Reeves** did in fact combine, conspire and confederate, sometimes acting jointly and at others individually to deprive **Braun** of her *Constitutionally Protected Civil Rights* to have *redress* in the Courts and her *Constitutional Right* to Counsel when **Reeves**, in combination with **DFB** covertly represented **DFB** while purporting to represent **Braun** and actually **Reeves** representing **DFB** and concocting schemes against **Braun**.

52. Defendants **DFB, Reeves** did in fact combine, conspire and confederate, sometimes acting jointly and at others individually and with others known and unknown to deprive **Braun** of her *Constitutionally Protected Civil Rights* to have *redress* in the Courts and her *Constitutional Rights* when **Reeves, DFB** and others, known and unknown engaged in a conspiracy to prevent **Braun** from access to official documents and reports which establish and confirm abuse of **CB** by **DFB**.

COUNT 5

53. Defendant **DFB** did in fact take the biological child (**CB**) from **Braun** and did in fact transport her across state lines for the purposes of, *inter alia*, physical, mental and sexual abuse, as found by MULTIPLE professionals, depriving **Braun** of her *Constitutionally Protected Rights* to have her child and provide motherly protections given freely under the law.

COUNT 6

54. Defendants **DFB, Reeves** did in fact combine, conspire, and confederate, sometimes acting jointly and at others individually and with others known and unknown to deprive **Braun** of her *Constitutionally Protected Civil Rights of Due Process* by engaging in slander by knowingly telling and promulgating to officials, judges, and the public the false allegation(s) that **Braun** was *bipolar* and had *Munchausen by proxy disorder*.

COUNT 7

55. Defendants **DFB, Reeves** did in fact combine, conspire, and confederate, sometimes acting jointly and at others individually and with others known and unknown to deprive **Braun** of her *Constitutionally Protected Civil Rights of Due Process* and fair equitable rights under state and federal law by engaging in libel by knowingly publishing and distributing papers of a knowingly false report that **Braun** had *Munchausen by proxy syndrome*.

COUNT 8

56. Defendants **STATE** did in fact violate the state and federal civil rights of **Braun** by willfully concealing reports of abuse of **Braun** and **CB** by **DFB**.

COUNT 9

57. Defendants **STATE** did in fact violate the state and federal civil rights of **Braun** by refusing to provide protections to **Braun** and her child (**CB**) otherwise provided by Constitution, Statute, and both Federal and State laws when MULTIPLE professionals attested that **DFB** was abusing **CB** and **Braun**.

COUNT 10

58. Defendants **STATE & Reeves** did in fact combine, conspire and confederate, sometimes acting jointly and at others individually and with others known and unknown to deprive **Braun** of her *Constitutionally Protected Civil Rights of Due Process* and fair equitable rights under state and federal law by engaging in concealment of known findings of abuse of the minor child (**CB**) of **Braun** and of **Braun** by **DFB**.

COUNT 11

59. Defendant **Reeves** did in fact violate the core of civil rights of **Braun** by covertly representing **DFB** while pretending to represent **Braun** in violation of the laws in state and federal statutes, regulations and covenants and violation of *Constitutionally Protected Rights* of **Braun**.

COUNT 12

60. Defendant **DFB** did in fact knowingly infect the **Plaintiff (Braun)** and her minor child with a sexually transmitted disease by willfully and knowingly concealing that he had a sexually transmitted disease prior to any physical contact between **DFB** and **Braun**.

RELIEF SOUGHT

61. **Plaintiff** hereby demands a **Trial by Jury**.
62. **Plaintiff** hereby demands an immediate temporary and permanent injunction against **All Defendants** which commands them to cease and desist any further broadcast, promulgation, publishing or otherwise making known the false and malicious allegations that the **Plaintiff (Braun)** is *bipolar*, has *Munchausen By Proxy* or any other mental condition.
63. **Plaintiff** hereby demands an immediate temporary and permanent injunction against **STATE** which requires them to protect the **Plaintiff** and her minor child (**CB**) from any further abuse by **DFB** and to enforce the laws promulgated to protect **Braun** and her child (**CB**.)
64. **Plaintiff** hereby demands a judgment against **DEFENDANTS DFB and Reeves**, **jointly and severally** in the amount of \$3,500,000.00 for actual/compensatory damages caused by the malicious and intentional wrongful schemes of the Defendants.
65. **Plaintiff** hereby demands a judgment against **DEFENDANTS DFB and Reeves**, **jointly and severally** in the amount of \$2,000,000.00 in punitive damages for willfully engaging a scheme to defame **Braun** in violations of her civil rights by defaming her reputation in the community, causing repulsion and shame to **Braun** by making knowingly false statements about the mental condition of **Braun**.
66. **Plaintiff** hereby demands a judgment against **DFB** in an amount of \$1,000,000.00 in punitive damages for knowingly and willingly transmitting a sexually

transmitted disease on the **Plaintiff** and her minor child (**CB**) and concealing that **DFB** is infected prior to any physical contact.

67. **Plaintiff** hereby demands a judgment against **DEFENDANTS DFB** and **Reeves**, **jointly and severally** in the amount of \$5,000,000.00 in punitive damages for willfully concocting and engaging in schemes to deprive the **Plaintiff (Braun)** (and her child **CB**) of their *Constitutionally Protected Rights and Protections of law*.
68. **Plaintiff** hereby demands a temporary and permanent injunction which prohibits **Defendant Reeves** from engaging in any form of legal representation of **DFB** or any other party against **Braun** and further prohibits **Reeves** from divulging any information about **Braun** to any other party or entity about **Braun**, her matters or in any way relevant to **Braun**.
69. **Plaintiff** hereby requests pre and post judgment interest on the judgments.
70. **Plaintiff** also requests any and all other relief that Braun may be lawfully entitled to.

I, Plaintiff Staci Anne Braun, M.D., do hereby swear and affirm and make this Complaint under oath and do hereby certify that the facts and complaints alleged herein are true and accurate to the knowledge and belief.

Respectfully submitted and sworn to,

Staci Anne Braun, M.D.

Staci Anne Braun, M.D.,

STATE OF NORTH CAROLINA

COUNTY OF Mecklenburg

I, Alexandra M Johnson a Notary Public, do hereby certify that Staci Anne Braun, M.D., personally appeared before me this day and acknowledged the due execution of the foregoing instrument. Witness my hand and (where an official seal is required by law) official seal

This the 4th day of August, 2022 (year).

(Official seal.)

Notary Public

Printed Name: Alexandra M Johnson

My Commission Expires:

11-11-2024

